

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a	§	
BRAZOS LICENSING AND	§	CIVIL ACTION NO. 6:20-cv-487
DEVELOPMENT,	§	CIVIL ACTION NO. 6:20-cv-488
	§	CIVIL ACTION NO. 6:20-cv-489
Plaintiff,	§	CIVIL ACTION NO. 6:20-cv-490
	§	CIVIL ACTION NO. 6:20-cv-491
v.	§	CIVIL ACTION NO. 6:20-cv-492
	§	CIVIL ACTION NO. 6:20-cv-493
ZTE CORPORATION, ZTE (USA) INC.,	§	CIVIL ACTION NO. 6:20-cv-494
AND ZTE (TX), INC.	§	CIVIL ACTION NO. 6:20-cv-495
	§	CIVIL ACTION NO. 6:20-cv-496
Defendants.	§	CIVIL ACTION NO. 6:20-cv-497
	§	
		<b>JURY TRIAL DEMANDED</b>

**OPPOSED MOTION FOR LEAVE TO FILE SUR-REPLY OPPOSING  
DEFENDANTS' MOTION TO TRANSFER**

Plaintiff WSOU Investments, LLC doing business as Brazos Licensing and Development (“WSOU”) respectfully requests leave to file the attached Sur-reply Opposing Defendants’ Motions to Transfer. Plaintiff’s request leave to file a sur-reply because Defendants make new arguments and allegations in their reply brief. Because these allegations and arguments were not included in Defendants’ opening brief, Plaintiff had no opportunity to address them in its response. Plaintiff’s proposed sur-reply is 5 pages and addresses only allegations and arguments raised for the first time in Defendants’ reply brief. The parties conferred regarding this motion by phone on November 20, 2020 and by email on November 22, 2020. Defendants’ oppose this motion.

Dated: November 27, 2020

Respectfully submitted,

/s/ Ryan Loveless

James L. Etheridge

Texas State Bar No. 24059147

Ryan S. Loveless

Texas State Bar No. 24036997

Brett A. Mangrum

Texas State Bar No. 24065671

Travis Lee Richins

Texas State Bar No. 24061296

ETHERIDGE LAW GROUP, PLLC

2600 E. Southlake Blvd., Suite 120 / 324

Southlake, Texas 76092

Telephone: (817) 470-7249

Facsimile: (817) 887-5950

[Jim@EtheridgeLaw.com](mailto:Jim@EtheridgeLaw.com)

[Ryan@EtheridgeLaw.com](mailto:Ryan@EtheridgeLaw.com)

[Brett@EtheridgeLaw.com](mailto:Brett@EtheridgeLaw.com)

[Travis@EtheridgeLaw.com](mailto:Travis@EtheridgeLaw.com)

Mark D. Siegmund

State Bar No. 24117055

[mark@waltfairpllc.com](mailto:mark@waltfairpllc.com)

Law Firm of Walt, Fair PLLC.

1508 North Valley Mills Drive

Waco, Texas 76710

Telephone: (254) 772-6400

Facsimile: (254) 772-6432

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I certify that on November 27, 2020 a true and correct copy of the foregoing document was served upon all counsel of record via email under this Court's Local Rules.

/s/ Travis Richins

Travis Richins

**CERTIFICATE OF CONFERENCE**

I certify that the parties conferred regarding this motion by phone on November 20, 2020 and by email on November 22, 2020. Defendants oppose this motion.

/s/ *Travis Richins*  
Travis Richins